STERN & EISENBERG, PC 1581 MAIN STREET, SUITE 200 THE SHOPS AT VALLEY SQUARE WARRINGTON, PA 18976 TELEPHONE: (215) 572-8111 FACSIMILE: (215) 572-5025 (COUNSEL FOR MOVANT)

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re:	
Giovanni Abreu	Chapter: 13
Debtor	_
	Bankruptcy Case: 19-13200
Rafael Abreu	
Non-Filing Co-Debtor	
U.S. Bank National Association, not in its individual	
capacity, but solely as legal title trustee for BCAT	
2016-17TT	
Creditor/Movant	
v.	
Giovanni Abreu	
Respondent	

CONSENT ORDER/STIPULATION SETTLING MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, this 22nd day of January 2020, upon the Motion of U.S. Bank National Association, not in its individual capacity, but solely as legal title trustee for BCAT 2016-17TT (hereinafter "Creditor"), through its Counsel, Stern & Eisenberg PC, under 11 U.S.C. § 362(d) (and § 1301) for relief from the automatic stay as to the real property located at 205 W Green St, Reading, PA 19601 (hereinafter, the "Property"), and the parties agreeing to the entry of the Order settling the Motion for Relief and for cause shown, it is hereby ORDERED AND DECREED as follows:

- 1. The Automatic Stay of all proceedings, as provided under 11 U.S.C. §362, is modified and annulled to allow Movant (and any assignee/successor-in-interest) to proceed with its state court remedies under state and federal law, including by not limited an action in mortgage foreclosure regarding the Property.
- 2. The Automatic Stay (under 11 U.S.C. §362) with regard to the Property shall not arise as to Movant (and any assignee/successor-in-interest) in this Bankruptcy or any other Bankruptcy filed by Debtor.
- 3. It is further agreed that the 14-day stay provided by Rule 4001(a)(3) is hereby waived.
- 4. Facsimile signatures shall be as valid as original signatures and this Consent Order/Stipulation may be signed in counterparts.

By signing this Stipulation/Consent Order, Debtor's Counsel represents that Debtor is familiar with and understand the terms of the Stipulation/Consent Order and agree to said terms regardless of whether Debtor has actually signed said stipulation. Seen and agreed by the parties on the date set forth below:

/s/Daniel P. Jones, Esq.
Daniel P. Jones, Esq.
Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Telephone: (215) 572-8111

Email: djones@sterneisenberg.com

Counsel for Creditor Date: January 22, 2020 Joseph T. Bambrick Jr., Esquire 529 Reading Avenue, Suite K West Reading, PA 19611 (610) 372-6400

Email: NO1JTB@juno.com Counsel for Debtor(s)

Date: